

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Petition of BellSouth For Forbearance From
Application of the Separate Subsidiary
Requirements of Section 272 of the
Communications Act of 1934, as Amended,
To Provide International Directory
Assistance Service

CC Docket No. 97-172

PETITION FOR FORBEARANCE

BELLSOUTH CORPORATION

Angela N. Brown

Its Attorney

Suite 4300
675 West Peachtree Street, N. W.
Atlanta, Georgia 30375-0001
(404) 335-0724

Date: December 20, 2002

TABLE OF CONTENTS

I.	SUMMARY AND BACKGROUND	2
II.	FORBEARANCE FROM APPLYING THE SEPARATE AFFILIATE REQUIREMENTS OF SECTION 272 TO BELL SOUTH'S PROVISION OF INTERNATIONAL DIRECTORY ASSISTANCE SERVICE IS WARRANTED.....	7
A.	Application of Section 272 to BellSouth's Provision of International Directory Assistance Is Not Necessary To Ensure That Rates and Practices Are Just and Reasonable and Not Unjustly or Unreasonably Discriminatory	8
B.	Application of Section 272 to BellSouth's Provision of International Directory Assistance Is Not Necessary To Ensure That Consumers Are Protected.....	10
C.	Forbearance from Applying Section 272 to BellSouth's Provision of International Directory Assistance Will Serve the Public Interest.....	12
III.	CONCLUSION	14

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of

Petition of BellSouth For Forbearance From
Application of the Separate Subsidiary
Requirements of Section 272 of the
Communications Act of 1934, as Amended,
To Provide International Directory
Assistance Service

CC Docket No. 97-172

PETITION FOR FORBEARANCE

BellSouth Corporation, on behalf of BellSouth Telecommunications, Inc. (collectively "BellSouth"), hereby petitions the Commission, pursuant to Section 10 of the Communications Act of 1934, as amended¹ ("Act"), to forbear from applying the structural separation requirements of Section 272² of the Act, so as to allow BellSouth to provide international directory assistance service on an integrated basis together with its local and nonlocal directory assistance services. This Petition seeks forbearance from the requirements of Section 272 consistent with the relief previously granted to BellSouth (and other similarly situated Regional Bell Operating Companies ("RBOCs")) for the provision of nonlocal directory assistance.³ If granted the relief requested herein,

¹ 47 U.S.C. § 160.

² 47 U.S.C. § 272.

³ *See, e.g., BellSouth Petition for Forbearance for Nonlocal Directory Assistance Service; Petition of SBC Communications Inc. for Forbearance of Structural Separation Requirements and Request for Immediate Interim Relief in Relation to the Provision of*

BellSouth agrees to offer international directory assistance subject to the same conditions attached to its provision of nonlocal directory assistance.⁴

I. SUMMARY AND BACKGROUND

On September 27, 1999, the Commission released the *U S WEST Forbearance Order*, granting in part, U S WEST's petition for forbearance to provide nonlocal directory assistance. In that order, the Commission concluded that U S WEST's provision of nonlocal directory assistance⁵ service to its in-region subscribers constituted the provision of in-region, interLATA service, as defined in Section 271(a) of the Act.⁶ The Commission further concluded that U S WEST's nonlocal directory assistance service was a permitted incidental interLATA service under Section 271(g)(4) and was thus an appropriate arrangement for consideration of forbearance from the requirements of Section 272. The Commission observed that, if U S WEST brought its nationwide

Nonlocal Directory Assistance Services; Petition of Bell Atlantic for Further Forbearance from Section 272 Requirements in Connection with National Directory Assistance Services, CC Docket No. 97-172, *Memorandum Opinion and Order*, 15 FCC Rcd 6053 (2000) ("*BellSouth Forbearance Order*"); *Petition of Bell Atlantic for Forbearance from Section 272 Requirements in Connection with National Directory Assistance Services*, CC Docket No. 97-172, *Memorandum Opinion and Order*, 14 FCC Rcd 21484 (1999) ("*Bell Atlantic Forbearance Order*"); *Petition of U S WEST Communications, Inc. for a Declaratory Ruling Regarding the Provision of National Directory Assistance, et al.*, CC Docket Nos. 97-172 and 92-105, *Memorandum Opinion and Order*, 14 FCC Rcd 16252 (1999) ("*U S WEST Forbearance Order*").

⁴ See *infra* note 14 and accompanying text.

⁵ According to the Commission, "[d]irectory assistance is considered 'local' whenever a customer requests the telephone number of a subscriber located within his or her LATA or area code. . . . Directory assistance service is considered 'nonlocal' whenever a customer requests the telephone number of a subscriber located outside his or her home LATA or area code." *U S WEST Forbearance Order*, 14 FCC Rcd at 16254-55, ¶¶ 5-6.

⁶ *U S WEST Forbearance Order*, 14 FCC Rcd at 16254, ¶ 2.

nonlocal directory assistance into compliance with Section 271(g)(4), such as by providing directory assistance service from storage facilities which it owned, its nonlocal service would be covered by the forbearance relief granted by the Commission.⁷

The Commission further found that “the nondiscrimination requirements of Section 272(c)(1) constitute statutory obligations that may be enforced separate and apart from the structural separation requirements of Section 272,”⁸ and concluded that the retention of those requirements would be sufficient to ensure that U S WEST’s provision of its nonlocal directory assistance service would satisfy the requirements of Section 10(a)(1).⁹ Exercising its right to grant or deny a petition in part, the Commission chose to forbear from applying the separate affiliate requirements of Section 272, and relied upon the nondiscrimination requirements in that Section as “sufficient to prevent U S WEST from gaining an unfair competitive advantage in the nonlocal directory assistance service market.”¹⁰

Subsequent to the U S WEST decision, a number of other RBOCs, including BellSouth, sought and received similar forbearance relief for their provision of nonlocal directory assistance services.¹¹ As in the *U S WEST Forbearance Order*, the Commission concluded that BellSouth’s provision of nonlocal directory assistance to its in-region

⁷ *Id.*

⁸ *Id.* at 16274, ¶ 38.

⁹ *Id.*

¹⁰ *Id.*

¹¹ See, e.g., *BellSouth Forbearance Order*, 15 FCC Rcd 6053; *Bell Atlantic Forbearance Order*, 14 FCC Rcd 21484; *U S WEST Forbearance Order*, 14 FCC Rcd 16252 (1999).

subscribers was a permissible incidental interLATA service under Section 271(g)(4).¹²

Although the Act requires that incidental interLATA services provided pursuant to Section 271(g)(4) be offered through a separate affiliate, the Commission forbore, in part, from applying the structural separation requirements of Section 272 to BellSouth's provision of nonlocal directory assistance service.¹³ The Commission allowed BellSouth to provide its nonlocal directory assistance services on an integrated basis, but required it to make available to unaffiliated entities all of the in-region telephone numbers used to provide nonlocal directory assistance services at the same rates, terms, and conditions, that BellSouth imputes to, or imposes upon, its own nonlocal directory assistance operations.¹⁴

Since the Commission first forbore from applying the separate affiliate requirements of Section 272 to BellSouth's provision of nonlocal directory assistance

¹² *BellSouth Forbearance Order*, at 15 FCC Rcd at 6054, ¶ 1.

¹³ *Id.* at 6054, 6060-62, ¶¶ 2, 14-17.

¹⁴ *Id.* at 6054, 6060-61, ¶¶ 2, 14-15. Based on the Commission's previous findings, BellSouth would not be obligated to provide nondiscriminatory access to the listings it uses to provide international directory assistance. The rationale for refraining from imposing this requirement on the RBOCs in the prior forbearance orders was that they did not exercise monopoly power over the components used to provide telephone numbers of customers outside their regions. *U S WEST Forbearance Order*, 14 FCC Rcd at 16271, ¶ 33; *Bell Atlantic Forbearance Order*, 14 FCC Rcd at 21491, ¶ 14; *BellSouth Forbearance Order*, 14 FCC Rcd at 6060, ¶ 14. The Commission noted that, like competing providers of nonlocal directory assistance service, the RBOCs must obtain the telephone numbers of subscribers outside their respective regions from nonaffiliated entities that compile national listings or from other LECs. Therefore, the Commission expressly excused the RBOCs from providing telephone numbers of subscribers outside their regions to unaffiliated providers of nonlocal directory assistance. *U S WEST Forbearance Order*, 14 FCC Rcd at 16271, ¶ 33; *Bell Atlantic Forbearance Order*, 14 FCC Rcd 21491, ¶ 14; *BellSouth Forbearance Order*, 14 FCC Rcd at 6060, ¶ 14. If the Commission grants the requested forbearance relief, it should affirm its previous

service over two years ago, BellSouth has obtained authorization to provide in-region, interLATA telecommunications services pursuant to Section 271(d) for all nine states within its region.¹⁵ On December 19, 2002, BellSouth received approval to provide in-region, interLATA telecommunications services in its last two states.¹⁶

Now that BellSouth has received authority to provide in-region, interLATA telecommunications services throughout its territory, the Act allows BellSouth to provide nonlocal directory assistance to subscribers in those states pursuant to Section 271(d), rather than under the Section 271(g)(4) exception for incidental interLATA services.¹⁷

determination and state that BellSouth is not obligated to provide nondiscriminatory access to the listings it uses to provide international directory assistance.

¹⁵ See *Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., And BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services In Georgia and Louisiana*, CC Docket No. 02-35, *Memorandum Opinion and Order*, FCC 02-147 (rel. May 15, 2002); *Joint Application by BellSouth Corporation, BellSouth Telecommunications, Inc., And BellSouth Long Distance, Inc. for Provision of In-Region, InterLATA Services in Alabama, Kentucky, Mississippi, North Carolina, and South Carolina*, WC Docket No. 02-150, *Memorandum Opinion and Order*, FCC 02-260 (rel. Sept. 18, 2002); *Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Authorization To Provide In-Region, InterLATA Services in Florida and Tennessee*, WC Docket No. 02-307, *Memorandum Opinion and Order*, FCC 02-331 (rel. Dec. 19, 2002).

¹⁶ See *Application by BellSouth Corporation, BellSouth Telecommunications, Inc., and BellSouth Long Distance, Inc., for Authorization To Provide In-Region, InterLATA Services in Florida and Tennessee*, WC Docket No. 02-307, *Memorandum Opinion and Order*, FCC 02-331 (rel. Dec. 19, 2002).

¹⁷ As the Commission has concluded, once an RBOC receives Section 271 approval in all states within its region, its reliance on Section 271(g)(4) as the basis for its ability to offer nonlocal directory assistance becomes moot. See *Petition of U S WEST Communications, Inc. for A Declaratory Ruling Regarding the Provision of National Directory Assistance*, CC Docket No. 97-172, *Order on Reconsideration*, FCC 02-241, ¶ 15 n.47 (rel. Sept. 6, 2002) (“*Order on Reconsideration*”). Accordingly, the prior forbearance relief granted for the provision of nonlocal directory assistance combined with the Section 271 approvals in every state within its region allows BellSouth to offer nonlocal directory assistance on an integrated basis to its in-region subscribers without having to own 10 percent or more of the storage facilities used to provide this service.

As indicated above, the Commission has already forbore from applying the separate affiliate requirements of Section 272 to BellSouth's provision of nonlocal directory assistance on the grounds that the Section 10 forbearance criteria have been met and such forbearance will serve the public interest.¹⁸

BellSouth's provision of international directory assistance service is a logical extension of its directory assistance services, and similar to the provision of nonlocal directory assistance, meets the statutory criteria for forbearance as set forth in Section 10.¹⁹ Accordingly, BellSouth respectfully requests that the Commission forbear from applying the separate affiliate requirements of Section 272 and authorize BellSouth to provide international directory assistance on an integrated basis.²⁰ If the Commission

¹⁸ *BellSouth Forbearance Order*, 14 FCC Rcd at 6061-62, ¶ 17.

¹⁹ Arguably, international directory assistance fits within the Commission's definition of nonlocal directory assistance; however, the Commission has yet to address the classification of international directory assistance services. According to the Commission, its prior U S WEST decision "was clearly confined to the issue of domestic directory assistance services." *Order on Reconsideration*, ¶ 15. Given the apparent limits on the Commission's previous rulings, BellSouth is requesting similar forbearance relief as that granted for the provision of nonlocal directory assistance.

²⁰ If the Commission grants the forbearance relief requested herein and allows BellSouth to provide international directory assistance on an integrated basis, BellSouth respectfully requests a waiver of the Comparably Efficient Interconnection ("CEI") requirements so that it may expand its operator-assisted and electronic reverse search offerings to include international directory assistance. On July 19, 2002, the Commission granted BellSouth's request for a waiver of the CEI requirements to allow BellSouth: (1) to provide nonlocal operator-assisted and electronic reverse directory services; (2) to provide reverse search capabilities in connection with its direct access to directory assistance service; and (3) to expand its existing reverse search capabilities to enable customers to search by all or part of a street address or range of street addresses. *BellSouth Petition for Waiver of the Computer III Comparably Efficient Interconnection Requirements; Petition of the Verizon Telephone Companies for Waiver of Comparably Efficient Interconnection Requirements to Provide Reverse Directory Assistance*, CC Docket Nos. 01-288, 02-217, *Memorandum Opinion and Order*, DA 02-1747 (rel. July 19, 2002). BellSouth is requesting a similar waiver of the CEI requirements to add

grants the relief requested herein, BellSouth agrees to offer international directory assistance subject to the same conditions attached to its provision of nonlocal directory assistance.²¹

II. FORBEARANCE FROM APPLYING THE SEPARATE AFFILIATE REQUIREMENTS OF SECTION 272 TO BELL SOUTH'S PROVISION OF INTERNATIONAL DIRECTORY ASSISTANCE SERVICE IS WARRANTED.

Section 10(a) of the Act requires the Commission to forbear from applying the structural separation requirements of Section 272 to BellSouth's provision of international directory assistance if the three-pronged test of Section 10 is satisfied. The Commission must grant forbearance if: (1) enforcement of Section 272 is not necessary to ensure that the charges, practices, classifications, or regulations associated by, for, or in conjunction with that telecommunication carrier or service are just and reasonable and not unjustly or unreasonably discriminatory; (2) enforcement of Section 272 is not necessary to protect consumers; and (3) forbearance is consistent with the public

international listings to its reverse directory assistance offerings. In the event of a waiver of the CEI requirements, BellSouth agrees to comply with the previous conditions imposed on BellSouth's provision of reverse directory services. Specifically, BellSouth will comply with the Commission's joint cost rules and make the appropriate amendments to its cost allocation manual. *See BellSouth Petition for Waiver of the Computer III Comparably Efficient Interconnection Requirements; Petition of the Verizon Telephone Companies for Waiver of Comparably Efficient Interconnection Requirements to Provide Reverse Directory Assistance*, CC Docket Nos. 01-288 and 02-217, *Memorandum Opinion and Order*, DA 02-1747, ¶ 13 (rel. July 19, 2002).

²¹ Should the Commission grant the forbearance relief requested herein, it should affirm that BellSouth is able to use the 411 or 1-411 dialing codes in conjunction with its international directory assistance services. This outcome is consistent with the Commission's previous forbearance orders. In the *U S WEST Forbearance Order*, the Commission found that "the benefits to consumers of being able to dial 411 or 1-411 dialing code to obtain both local and nonlocal telephone numbers are substantial." *U S WEST Forbearance Order*, 14 FCC Rcd at 16280, ¶ 51. The same conclusion holds true here.

interest.²² Just as BellSouth's provision of nonlocal directory assistance satisfied all three criteria of Section 10, so does BellSouth's provision of international directory assistance. Accordingly, the Commission should forbear from the applying the structural separation requirements of Section 272 to BellSouth's provision of international directory assistance.

A. Application of Section 272 to BellSouth's Provision of International Directory Assistance Is Not Necessary To Ensure That Rates and Practices Are Just and Reasonable and Not Unjustly or Unreasonably Discriminatory.

Application of the separate affiliate requirements to BellSouth's provision of international directory assistance is not necessary to ensure that the rates and practices associated with this service are just, reasonable, and nondiscriminatory. In considering the first prong of Section 10 in the *BellSouth Forbearance Order*, the Commission found it relevant that BellSouth was a new entrant in the market for nonlocal directory assistance service and faced competition from interexchange carriers ("IXCs"), Internet service providers, and providers of payphone and cellular services.²³ The Commission also was persuaded by the fact that BellSouth did not exercise monopoly power over the components used to provide the telephone numbers of customers outside its region.²⁴

These same facts previously found compelling by the Commission apply with equal force in the instant case. Indeed, BellSouth will face formidable competition in the market for international directory assistance. Its principal competitors will be the IXCs,

²² 47 U.S.C. § 160(a).

²³ *BellSouth Forbearance Order*, 15 FCC Rcd at 6060, ¶ 14.

²⁴ *Id.*

which have historically been the dominant providers of this service. Today, international directory assistance is available through IXC's such as AT&T, WorldCom, and Sprint. If the Commission grants the relief requested herein, BellSouth will be the new entrant in this market. Besides other long distance carriers, international directory assistance is subject to competition from other sources, including a host of Internet sites that provide the same or similar service.²⁵

Market forces will ensure that BellSouth will not charge unreasonable rates for international directory assistance. As the Commission previously found in the *U S WEST Forbearance Order*, "competition is the most effective means of ensuring that the charges, practices, classifications, and regulations . . . are just and reasonable, and not unjustly or unreasonably discriminatory."²⁶ The same holds true here for the provision of international directory assistance.

Applying Section 272 to BellSouth's provision of international directory assistance would have the counterproductive effect of leading to higher rates for this service. Imposing the separate affiliate requirement would necessitate duplication of systems, equipment, and personnel functions, thereby eliminating the economies that can be realized by sharing these resources. This inefficiency would make the provision of the service significantly more costly, forcing BellSouth to charge higher prices to consumers. Such a restriction would effectively eliminate BellSouth as a viable competitor thereby decreasing the incentive of competitors to engage in competitive price reductions.

Clearly, requiring compliance with the separate affiliate requirements would work against

²⁵ See, e.g., www.Anywho.com/international.html; www.10-10phonerates.com/intl.html; www.whowhere.lycos.com/wwphone/world.html; www.infospace.com.

²⁶ *U S WEST Forbearance Order*, 14 FCC Rcd at 16270, ¶ 31.

ensuring that the charges for international directory assistance service are reasonable and competitive. The Commission cannot desire such a result.

Given that international directory assistance would be an extremely small percentage of overall directory assistance call volume, the costs of providing this service through a separate affiliate would significantly outweigh the benefits of providing this service. Moreover, because international directory assistance would comprise such a small piece of BellSouth's directory assistance business, there should be no concern about possible anti-competitive conduct. Thus, enforcement of the separate affiliate requirements is not necessary to ensure that the rates and practices associated with BellSouth's provision of international directory assistance are just, reasonable, and nondiscriminatory.

B. Application of Section 272 to BellSouth's Provision of International Directory Assistance Is Not Necessary To Ensure That Consumers Are Protected.

The second prong of the forbearance test requires the Commission to determine that "enforcement of [Section 272] is not necessary for the protection of consumers."²⁷ This prong is easily met also. Forbearance from the separate affiliate requirements would stimulate competition by facilitating the entry of additional providers into the market, thereby resulting in more choices and competitive pricing. As the Commission stated in the *U S WEST Forbearance Order* and reiterated in the *BellSouth Forbearance Order*, "[t]he introduction of additional competitors in the nonlocal directory services market will, in turn, encourage the providers of these services to compete on the basis of price

²⁷ 47 U.S.C. § 160(a)(2).

and quality, which will ultimately benefit consumers.”²⁸ As discussed above, the primary effect of applying the structural separation requirements of Section 272 to BellSouth’s provision of international directory assistance would be the substantial increase in the costs of providing this service. Higher operating costs would force BellSouth to choose between charging higher rates for the service and not offering it at all. Neither result would benefit consumers.

Moreover, the nondiscrimination requirements of Section 272 that will remain will ensure that consumers are protected. As BellSouth has indicated, it agrees to be bound by the same terms and conditions of the prior forbearance relief granted for the provision of nonlocal directory assistance. Specifically, BellSouth will continue to allow other carriers nondiscriminatory access to its in-region listings. In the *BellSouth Forbearance Order*, the Commission noted that “retention of the section 272(c)(1) nondiscrimination requirements with respect to [BellSouth’s] in-region telephone numbers should protect consumers by promoting the development of a fully competitive market for nonlocal directory assistance service, and by ensuring that no competitor will have an undue advantage in the nonlocal directory assistance services market.”²⁹ This conclusion holds true in the instant case. In light of the foregoing, the Commission must find that the second forbearance criterion is met.

²⁸ *U S WEST Forbearance Order*, 14 FCC Rcd at 16278, ¶ 47.

²⁹ *BellSouth Forbearance Order*, 15 FCC Rcd at 6061, ¶ 16.

C. Forbearance from Applying Section 272 to BellSouth's Provision of International Directory Assistance Will Serve the Public Interest.

The third prong of the forbearance standard requires the Commission to determine that the requested forbearance is "consistent with the public interest."³⁰ In making that determination, the Act requires the Commission to "consider whether forbearance . . . will promote competition among providers of telecommunications services."³¹ Moreover, the Commission has previously acknowledged that, "as section 10(b) directs, if [it] find[s] that forbearance from section 272 will enhance competition in the market in which the BOC seeks to enter, then such a finding may serve as the basis that forbearance is in the public interest."³²

As demonstrated above, BellSouth's provision of international directory assistance on an integrated basis will lead to increased competition with significant and tangible benefits to consumers. In granting BellSouth's previous Section 272 forbearance request for nonlocal directory assistance, the Commission concluded "that allowing [BellSouth] to provide nonlocal directory assistance service on an integrated basis is in the public interest because it will allow [BellSouth] to be [a] more effective competitor[] in the nonlocal directory assistance services market."³³ The Commission further found that requiring BellSouth to provide nonlocal directory assistance through a separate affiliate, while continuing to provide local directory assistance on an integrated basis,

³⁰ 47 U.S.C. § 160(a)(3).

³¹ 47 U.S.C. § 160(b).

³² *U S WEST Forbearance Order*, 14 FCC Rcd at 16269, ¶ 29.

³³ *BellSouth Forbearance Order*, 15 FCC Rcd at 6061-62, ¶ 17.

“would pose significant adverse competitive consequences. . . ,without positive benefits for consumers.”³⁴

There is a growing demand for international directory assistance services. BellSouth consistently receives calls from customers seeking to obtain international listings. However, BellSouth must turn those customers away. The result is customer confusion and frustration. Allowing customers to obtain all their directory assistance services from a single source rather than having to use multiple providers creates the one-stop-shopping framework the Commission has repeatedly advocated. Moreover, allowing BellSouth to offer local, nonlocal, and international directory assistance will enable businesses and consumers to access worldwide information quickly and conveniently, a need that is increasing in today’s global economy.

The grounds for granting BellSouth’s requested relief are essentially the same as those the Commission found persuasive in granting BellSouth’s previous forbearance request to provide nonlocal directory assistance service. In the *BellSouth Forbearance Order*, the Commission noted the existence of other companies already providing similar services in the absence of applying the structural separation requirements and concluded that the public interest would be served by providing consumers with additional competitive alternatives for directory assistance service.³⁵ In addition, in granting the forbearance petition, the Commission was persuaded that the costs of compliance with

³⁴ *Id.* at 6062, ¶ 17.

³⁵ *Id.* at 6061-62, ¶ 17.

the Section 272 requirements would far outweigh any potential benefits of compliance. The same reasons apply with equal force in the instant case.³⁶

In sum, application of the Section 272 structural separation requirements in this instance is simply not necessary. In fact, application of these requirements would likely result in a situation in which BellSouth would not be able to offer international directory assistance due to the inefficiencies and costs associated with providing this service through an affiliate. The end result would be diminished competition and reduced consumer choice. Competition is the cornerstone of the Commission's rules and policies. Allowing BellSouth to provide international directory assistance as part of its suite of directory assistance services on an integrated basis will provide consumers with more choices, which, in turn, will serve the public interest.

III. CONCLUSION

For all of the reasons articulated above, the Commission should forbear from applying the separate affiliate requirements of Section 272 so that BellSouth may provide international directory assistance on an integrated basis. Section 10 requires the Commission to forbear from applying a regulation if it determines that three criteria have been met. BellSouth has demonstrated that those criteria are satisfied. The analysis conducted by the Commission in its review of prior forbearance petitions for nonlocal directory assistance (including BellSouth's petition) resulted in a finding that forbearance was appropriate. That same analysis is equally applicable to the instant petition. Accordingly, BellSouth respectfully requests that the Commission grant its petition for forbearance from the separate affiliate requirements of Section 272 so that it may provide

³⁶ *Id.*

international directory assistance service on an integrated basis together with its local and nonlocal directory assistance services.

Respectfully submitted,

BELLSOUTH CORPORATION

Its Attorney

By: /s/ Angela N. Brown
Angela N. Brown

Suite 4300
675 West Peachtree Street, N. E.
Atlanta, GA 30375-0001
(404) 335-0724

December 20, 2002

CERTIFICATE OF SERVICE

I do hereby certify that I have this 20th day of December 2002 served the following parties to this action with a copy of the foregoing **PETITION FOR FORBEARANCE** by electronic filing and electronic mail addressed to the parties listed below.

+Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
The Portals, 445 Twelfth Street, S. W.
Room TW-A325
Washington, D. C. 20554

*Michelle Carey
Wireline Competition Bureau
Federal Communications Commission
The Portals, 445 Twelfth Street, S. W.
Room 5C122
Washington, D. C. 20554

*William Kehoe
Wireline Competition Bureau
Federal Communications Commission
The Portals, 445 Twelfth Street, S. W.
Room 5C312
Washington, D. C. 20554

*Ann H. Stevens
Wireline Competition Bureau
Federal Communications Commission
The Portals, 445 Twelfth Street, S. W.
Room 5C162
Washington, D. C. 20554

+ **VIA ELECTRONIC FILING**
** **VIA ELECTRONIC MAIL**

/s/ Juanita H. Lee _____
Juanita H. Lee